

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of the Amateur Service)	
Rules Governing Qualifying)	WT Docket No. 12-283
Examination Systems and Other)	
Matters)	
)	
Amendment of Part 97 of the)	
Commission's Amateur Service Rules)	RM-11629
to Give Permanent Credit for)	
Examination Elements Passed)	
)	
Amendment of Part 97 of the)	
Commission's Rules to Facilitate Use)	
in the Amateur Radio Service of)	RM-11625
Single Slot Time Division Multiple)	
Access Telephony and Data Emissions)	
)	
Request for Temporary Waiver)	
)	
Amendment of the Amateur Service)	
Rules Governing Vanity and Club)	WT Docket No. 09-209
Station Call Signs)	
)	
)	
)	
)	
By W. Lee McVey)	
W6EM)	
PG-12-19879)	
)	
)	
To: The Chief, Wireless)	
Telecommunications Bureau)	
)	

**REPLY TO THE COMMENTS OF PETE VAROUNIS AND STEPHEN J.
MELACHRINOS**

The following is my Reply to the Comments of Mr. Pete Varounis (Varounis) and Mr. Stephen J. Melachrinis, (Melachrinis) filed in the above captioned proceedings. It is timely filed in accordance with 47C.F.R. §1.45, §1.415 and §1.419.

1. The Amateur Radio Callbook magazine was published semi-annually for many years. Its editions contained amateur radio callsign and associated licensee address information data. The intended purpose was primarily for contacting amateurs for verification of two-way communications or “contacts,” mainly through mailed and exchanged QSL cards. Its editions included just the callsign and address information until Spring 1967. But, in succeeding editions, the class of each licensee was also included.¹ They had been used for years and still are today considered to be the “gold standard” for discerning older Technician licensees from present-day Technicians for General class upgrades for those licensed prior to March 21, 1987.²

2. Both Melachrinis and Varounis apparently use their editions for the purpose of assisting Volunteer Exam Coordinators in verifying former license class, in cases where licensee data predates the Commission’s ULS system.^{3 4}

¹ Melachrinis at 7.

² Varounis at 2. See also 47C.F.R. §97.505(a)4.

³ ULS, although not fully operational until 1998, contains July 1997 and newer licensee information.

⁴ Mr. Varounis was kind enough to research a mentor of mine in a Callbook who was licensed as W6GUG in the early 1960’s. Although he held an Advanced Class license, which was apparently granted in the early 1950’s, this was not discernable in early editions.

3. I concur with Melachrinos' suggestion of credit or lifetime licensure for Conditional class licensees as General Class licensees, should any interest in doing so still exist.⁵

Melachrinos says that he still receives requests from pre-March 21, 1987 Technician licensees, but cannot verify their class of license.⁶ Perhaps, as Mr. Varounis suggested in an email exchange, a default presumption of credit for Elements 2 and 3 (the General Class license) should be allowed if the prefix was not one of those used exclusively by Novice Class licensees and no indication in any Callbook edition exists showing the class of license. This seems to be a reasonable and fair approach under the circumstances as Novice class licenses contained unique "N" or "V" second-letter prefixes up to and beyond the editions of Callbook which began including license class data.

The above Reply Comments are offered with the intent of assisting the Commission in these extensive rulemaking proceedings.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "W. Lee McVey".

W. Lee McVey
3 Squires Glenn Lane
Leeds, AL 35094-4564
December 31, 2012

W6EM
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⁵ Melachrinos at 7.

⁶ Id at 6.

Certificate of Service

In accordance with 47CFR §1.47(g), this is meant to certify, under penalty of perjury, that I have served my Reply upon Mr. Varounis and Mr. Melachrinis, by placing true copies in the United States Mail, First Class postage-paid, to their respective addresses in the record of this proceeding, on this, the 31st day of December, 2012.



W. Lee McVey